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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Access Charge Reform

Price Cap Performance Review
for Local Exchange Carriers

Transport Rate Structure and Pricing

End User Common Line Charges

CC Docket No. 96-262

CC Docket No. 94-1

CC Docket No. ~~92~~⁹⁴-213

CC Docket No. 95-72

**OPPOSITION OF BELL ATLANTIC TO
PETITION FOR RULEMAKING**

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Dated: January 30, 1998

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SUMMARY

The Petitioners' request for a rulemaking proceeding to prescribe access charges at long run incremental or forward-looking cost should be rejected either as a far-too-late petition for reconsideration of the Commission's Access Charge Reform Order or as a grossly premature request for a new access charge reform proceeding.

The petition should be considered a late-filed petition for reconsideration of the Access Charge Reform Order, since the Commission clearly rejected the prescriptive approach in that order. The Petitioners cite no new, unanticipated events since the order was issued, other than a Court decision on unbundling that does not undermine the Commission's primary rationale for adopting the market-based approach. Since Section 405 of the Act requires petitions for reconsideration to be filed within 30 days, the petition should be dismissed as untimely.

If the Commission treats this as a petition for a new rulemaking (which it should not), it should dismiss it as being premature. Access charge reform has just begun, and the Commission has not even completed its implementation of the market-based approach, as it has not issued its rules on pricing flexibility for the local exchange carriers. Moreover, the facts contradict the Petitioners' arguments that competition in the local exchange market is a failure. The evidence shows that competition in the local exchange is both substantial and increasing rapidly. Instead of conducting a new rulemaking proceeding, the Commission should complete its implementation of the market-based approach by issuing its pricing flexibility order as soon as possible.

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**OPPOSITION OF BELL ATLANTIC¹ TO
PETITION FOR RULEMAKING**

The petition of the Consumer Federation of America, the International Communications Association, and the National Retail Federation ("Petitioners") for a new rulemaking proceeding on access charges should be rejected either as a far-too-late petition for reconsideration of the Commission's Access Charge Reform Order² or as a grossly premature request for a new access charge reform proceeding. Barely 7 months after the Commission adopted the Access Charge Reform Order, and prior to the date that the initial tariffs were filed to implement the new access charge structure, the Petitioners

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company; and New England Telephone and Telegraph Company.

² In the Matter of Access Charge Reform, 12 FCC Rcd 15982 (1997).

asked the Commission to brand access charge reform a failure and to prescribe immediate reductions in access charges to forward-looking economic cost. Their request misconstrues the Commission's findings in that order, which clearly rejected the prescriptive approach, and it ignores the rulemaking proceedings that are still underway to implement the market-based approach. More importantly, it is contrary to the evidence that competition in the local exchange is both substantial and increasing rapidly. Instead of conducting a new rulemaking proceeding, the Commission should complete its implementation of the market-based approach by issuing its pricing flexibility order as soon as possible.

I. The Petition For Rulemaking Is Procedurally Defective.

The Petitioners seek nothing less than a reversal of the Access Charge Reform Order, which, based on an extensive record, rejected the prescriptive approach to access charge reform.³ By stringing together a patchwork of disconnected quotes taken out of context, the Petitioners make it appear that the Commission's goal in access charge reform was to set access charges at long run incremental or forward-looking cost. Petition, pp. 1-2. In fact, the Commission found that “access charges should ultimately reflect rates that would exist in a competitive market” (emphasis added), and that “competition or, in the event that competition fails to develop, rates that approximate the prices that a competitive market would produce, best serve the public interest.”⁴ The

³ *See Access Charge Reform Order*, paras. 285-298.

⁴ *Id.*, para. 42.

Commission decided that “adopting a primarily market-based approach to reforming access charges will better serve the public interest than attempting immediately to prescribe new rates for all interstate access services based on the long-run incremental cost or forward-looking economic cost of interstate access services.”⁵ The Commission also stated that its “ultimate goal under any approach, whether market-based, prescriptive or combined, is to remove from price cap regulation LEC services that are subject to substantial competition.”⁶ Prescribing access charges at forward-looking cost is an approach that the Commission rejected because it would not promote the ultimate goal, which is a market controlled by competition, not regulation.

The Petitioners claim that the Commission “promise[d]” to “turn promptly to a prescriptive approach to access charges ‘if competition is not developing sufficiently for our market-based approach to work.’” Petition, pp. 2-3. The Commission made no such promise. The Commission simply made it clear that it might consider adjusting rates after reviewing costs studies four years later if competition had not developed sufficiently by that time for the market-based approach to work.⁷ The Commission clearly intended to allow several years for competition to work before considering alternatives to the market-based approach.

⁵ *Id.*, para. 263.

⁶ *Id.*, para. 259.

⁷ *See Id.*, paras. 48, 267.

Moreover, the market-based approach assumes that some markets will not become competitive immediately. The market-based approach is designed to give the local exchange carriers additional pricing flexibility as markets become more competitive.⁸ By definition, it contemplates that different markets will reflect different levels of competition, and that some markets will not be sufficiently competitive at a given point in time to warrant removal of current price restraints. In addition, the Commission has already prescribed substantial (and, we believe, excessive) rate reductions through the new, increased X-factor. The market-based approach was designed to remove this regulatory constraint as markets become sufficiently competitive to discipline prices.

For these reasons, the petition should be considered a request for reconsideration of the Access Charge Reform Order. As such, it should be rejected as untimely. Section 405 of the Act requires petitions for reconsideration to be filed within 30 days of a public notice, a deadline that expired long ago in this proceeding. Since the 30 day requirement is jurisdictional, it cannot be waived by the Commission.

If the Commission does not dismiss this filing as an untimely petition for reconsideration of the Access Charge Reform Order, it should deny it as a premature request for reevaluation of the market-based approach. As noted, the initial restructuring of access charges was just begun this month, and the Commission indicated that it will need several years' experience to determine if the market-based approach is working. Moreover, the Commission has not even completed its implementation of the market-

⁸ *See id.*, paras. 258, 266.

based approach, since it has not yet issued its rules on how the local exchange carriers can exercise pricing flexibility as markets become more competitive.⁹

There is no need, or justification, for establishment of a new rulemaking proceeding at this time. The only “changed circumstance” cited by the Petitioners is the July 18, 1997 Court decision that the local exchange carriers are not required to rebundle unbundled network elements.¹⁰ However, the availability of rebundled unbundled network elements was not a key factor in the Commission's adoption of the market-based approach. The Petitioners cite only a passing reference in the Access Charge Reform Order to the availability of unbundled network elements,¹¹ and that reference does not mention rebundling. More importantly, the Access Charge Reform Order makes it clear that the Commission adopted the market-based approach because it believed that the Telecommunications Act of 1996 would place increasing competitive pressure on the local exchange carriers’ access charges due to bypass of the incumbent local exchange carriers’ networks, either by competitive local exchange providers or by interexchange

⁹ *See id.*, para. 14. The Commission also plans to issue an order addressing whether, and to what extent, the incumbent local exchange carriers should be allowed to recover their unrecovered historical costs if competitive conditions prevent them from recovering such costs in their interstate access charges. *See id.* The Petitioners’ proposal to prescribe access charges at incremental cost levels would unjustifiably disallow recovery of these costs.

¹⁰ *See* Petition, pp. 6-7, *citing* Iowa Utilities Board v. FCC, 120 F.3d 753 (8th Cir. 1997).

¹¹ *See* Petition, p. 4, *citing* Access Charge Reform Order, para. 262.

carriers who will self-provide access services.¹² As is shown below, facilities-based competition in the local exchange market is continuing to grow rapidly despite the Court's decision. The Petitioners have not presented any facts that would warrant conducting a new rulemaking proceeding to abandon the market-based approach.¹³

II. The Petitioners Are Wrong On The Facts – Competition In The Local Exchange Is Substantial And Growing.

The Petitioners argue that it is time to ditch the market-based approach because “it is now apparent that competition is not developing sufficiently to restrain and reduce access charges in the immediate future.” Petition, p. 3. In fact, the latest data show that competition in the local exchange is substantial and growing rapidly, and that this competition has not been impeded by the Court's decision on the provision of unbundled network elements.

¹² *See Access Charge Reform Order*, para. 265.

¹³ To prescribe rates at forward-looking cost, the Commission first would have to find that the current access charges are unlawful. *See* 47 U.S.C. Section 205(a) (the Commission may prescribe rates “to be thereafter observed” only after finding that the current rates “[are] or will be in violation of any of the provisions of this Act”); *MTS and WATS Market Structure*, 93 F.C.C.2d 241, 256 (1983) (“this Commission must find that existing charges are or will be unlawful . . . in order to prescribe methods for computing charges”). The Petitioners present no evidence to show that current access charges, which comply fully with the Commission price cap rules, violate any provision of the Act.

Competitive local exchange carriers have already established fiber networks in over 300 cities nationwide.¹⁴ The incumbent local exchange carriers estimate that they have already lost over a million and a half telephone lines to competitors, practically all of which are business lines.¹⁵ In the Bell Atlantic region alone, we estimate that competitors are providing about 500,000 lines using their own facilities. Bell Atlantic has over 231,500 trunks connected to the switches of competitive local exchange carriers, over which more than 9.5 billion minutes of use were carried last year. This facilities-based competition presents a direct challenge to the local exchange carriers' interstate access services. Because this competition is switch-based, it does not depend upon the incumbent local exchange carriers' rebundling unbundled network elements.

The situation in New York, which is the most competitive market in the nation, refutes the Petitioners' arguments that competition has failed to materialize. First, the actual market data in New York are contrary to the Petitioners' well-worn claim that competitive local exchange carriers have been able to gain less than 1 percent of the local exchange market. Attached is a report compiled by the staff of the New York Public Service Commission based on data from only 15 of the 40 facilities-based competitive local exchange carriers in the State of New York. This report shows that these 15 carriers alone have already captured 5.5% of business lines in the state, and 2.1% of total access

¹⁴ *See* Testimony of Roy M. Neel, President, United States Telephone Association, presented to the Commission's *en banc* hearing on local competition on January 29, 1998.

¹⁵ *See id.*; *see also* Telco Competition Report, November 6, 1997, Vol. 6, No. 22, p. 17.

lines. If the lines provided by all of the competitive local exchange carriers in New York were included in this analysis, their total market share would be over 3 percent.¹⁶

Second, the way that the competitive local exchange carriers have captured market share in New York shows that they are competing successfully without relying on rebundled unbundled network elements. Even before the Court reached its decision in October 1997, competitive local exchange carriers had ordered only 118 combined unbundled network elements from Bell Atlantic in New York, but they had ordered close to 19,000 unbundled loops.¹⁷ This shows that competitive local exchange carriers use unbundled network elements primarily to connect their switches to end users that are not on their local distribution network. In any event, rebundled unbundled network elements are a small factor in the New York competitive landscape. The competitive local exchange carriers reported to the New York Public Service Commission that they provided 154,573 lines to end users with their own facilities.¹⁸ Bell Atlantic estimates that the total number of access lines provided by all competitive local exchange carriers

¹⁶ The New York Public Service Commission's report includes only 235,994 access lines provided by competitive local exchange carriers. Based on the number of lines that Bell Atlantic has resold to all of the competitive local exchange carriers in New York and on the amount of traffic that Bell Atlantic exchanges with these carriers' switches, Bell Atlantic estimates that the competitive local exchange carriers were providing about 350,000 lines through resale or their own facilities as of November 1997. *See* New York Public Service Commission, Case 97-C-0271, Supplemental Petition of Bell Atlantic-New York, pp. 4-5 (filed November 6, 1997).

¹⁷ This number continues to grow. By December 1997, the competitive local exchange carriers had purchased almost 20,000 unbundled loops.

¹⁸ *See* Attachment 1, p. 2.

in New York through their own facilities currently is about 250,000.¹⁹ This shows that the competitive local exchange carriers are an effective and growing competitive challenge in the market for exchange access services, while placing relatively little reliance on rebundled unbundled network elements.

Third, the Petitioners are wrong in claiming that competition for interstate access services will not emerge in the residential market unless the incumbent local exchange carriers rebundle unbundled network elements for their competitors. Petition, p. 7. The data reported to the New York Public Service Commission shows that these 15 carriers alone already serve 17,304 residential customers in New York, including 3,438 that they serve using their own facilities. While over 90 percent of their current customers are businesses, the Commission expected new entrants to concentrate their efforts initially in the most lucrative segments of the market.²⁰ The fact that the competitive local exchange carriers have already established a presence in the residential market in New York shows that access charges for residential customers are not immune from the forces of competition. In addition, competition for business customers will also put pressure on

¹⁹ *See* New York Public Service Commission Case 97-C-0271, Supplemental Petition of Bell Atlantic-New York, filed November 6, 1997, pp. 4-5. In addition, the competitive local exchange carriers are providing about 100,000 lines in New York through resale. *Id.*

²⁰ When the Commission adopted the market-based approach, it recognized that competitors would initially target the high-margin business market, but that competition in the broader market would emerge over time. *See Access Charge Reform Order*, para. 266 & n. 349.

the access charges applied to residential calls, since the local exchange carriers apply the same per-minute access charges to both residential and business customers.

Fourth, competition continues to grow rapidly. As is shown in Attachment 2, the number of central offices where competitive local exchange carriers have collocated in New York increased by almost 100 percent since 1995, and the total number of collocated multiplexing nodes increased by almost 400 percent. When the collocation nodes currently under construction are completed, the number of central offices with collocation will almost double. The amount of traffic exchanged between Bell Atlantic-New York and the competitive local exchange carriers increased by almost 400 percent in the last year alone. Another indication of the growth of competition is the number of NXX codes that have been assigned to competitive local exchange carriers. The number of codes increased in the last year from 149 to 374, representing 3.7 million telephone numbers.

To be sure, New York is experiencing the greatest amount of competitive penetration by competitive local exchange carriers. However, that is exactly why the Commission adopted a market-based approach that will tailor the degree of pricing flexibility to the degree of competition in each market. Moreover, the recent alliances of interexchange carriers with competitive local exchange carriers demonstrate that facilities-based carriers will present an increasing competitive challenge throughout the country, and that access charges will become subject to greater market discipline. WorldCom has already acquired MFS and plans to acquire Brooks Fiber, a facilities-based competitive local exchange carrier, and MCI, which provides local service through

MCI Metro.²¹ AT&T recently announced plans to acquire Teleport.²² AT&T in particular will pay a large multiple of Teleport's current revenues in order to gain control of Teleport's extensive local exchange facilities. AT&T would not have done so if it did not believe that it will be able to expand greatly Teleport's customer base in the local exchange market through facilities-based competition with the incumbent local exchange carriers. This will put even greater pressure on the local exchange carriers' access charges, since AT&T cites the avoidance of access charges as one of the features that motivated it to acquire Teleport.²³

These data show that it is far too soon to decide that competition has failed. To the contrary, there is every indication that the local exchange market and the exchange access market are becoming increasingly competitive.

III. The Commission Should Issue An Order Further Implementing The Market Based Approach.

The Petitioners' proposal to revert to a regulatory approach, prescribing drastic reductions in access charges, is precisely the wrong thing to do in a market where competition is growing rapidly. Reductions in access rates would discourage new entry by suppressing the revenues that competitive local exchange carriers would have the

²¹ *See* Wall Street Journal, October 2, 1997, p. A1.

²² *See* Wall Street Journal, January 9, 1998, p. A3.

²³ *See id.*

opportunity to receive from their own interstate access services.²⁴ For this reason, the competitive local exchange carriers generally oppose the prescriptive approach.²⁵ As the Commission recognized, “[r]egulation cannot replicate the complex and dynamic ways in which competition will affect the prices, service offerings, and investment decisions of both incumbent LECs and their competitors.”²⁶ A prescriptive approach would stifle, rather than encourage, competition.

The Commission should complete its implementation of the market-based approach by adopting rules allowing pricing flexibility as markets become more competitive. The extensive record in the Access Charge Reform Proceeding provides a basis for comprehensive rules that would tailor the degree of pricing flexibility to the degree of competition in each market. This would encourage additional competition by allowing the market to drive access prices to economically efficient levels.

²⁴ *See, e.g.*, Statement of Alfred E. Kahn, Reply Comments of USTA, Attachment 1, (filed February 14, 1997).

²⁵ *See, e.g.*, Comments of Time Warner, p. 19 (filed January 29, 1997); Time Warner Ex Parte Presentation, CC Docket No. 96-262, p. 4 (dated January 13, 1998) (opposing abandonment of market-based approach); Comments of Association for Local Telecommunications Services, p. 4 (filed January 29, 1997).

²⁶ Access Charge Reform Order, para. 289.

IV. Conclusion

For the foregoing reasons, the Commission should deny the Petitioners' request for a new rulemaking proceeding to prescribe access charge reductions.

Of Counsel

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Respectfully submitted,

By: 

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Dated: January 30, 1998

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

January 15, 1998

TO: All Parties
FROM: Kevin Schwenzfeier
SUBJECT Case 97-C-0271 --Results of Competitive Analyses

The results contained in the following analyses have been aggregated so as to protect company-specific information.

Please note that the information provided by the responding carriers was not always presented in a consistent or complete manner. In addition, the only carriers responding were those present at the Technical Conference held in December. Therefore, the analyses do not represent a precise picture of the competitive landscape throughout New York, but provide a reasonable estimate of the competitive activities of the responding carriers.

If you have any questions concerning the summaries, I can be reached at (518) 486-2814.

ACCESS LINES						
	NY METRO	UPSTATE	TOTAL	NY METRO	UPSTATE	TOTAL
CLEC FACILITIES-BASED						
Residential	3,438	0	3,438	2.4%	0.0%	2.2%
Business	142,476	8,659	151,135	97.6%	100.0%	97.8%
Total	145,914	8,659	154,573			
CLEC RESALE						
Residential	13,866	2,053	15,919	23.3%	9.4%	19.6%
Business	45,759	19,743	65,502	76.7%	90.6%	80.4%
Total	59,625	21,796	81,421			
CLEC FB + RESALE						
Residential	17,304	2,053	19,357	8.4%	6.7%	8.2%
Business	188,235	28,402	216,637	91.6%	93.3%	91.8%
Total	205,539	30,455	235,994			
NYT						
Residential	5,148,590	1,980,331	7,128,921	63.2%	72.3%	65.5%
Business	2,995,644	758,588	3,754,232	36.8%	27.7%	34.5%
Total	8,144,234	2,738,919	10,883,153			
*Note - Results based upon information provided by 15 CLECs. CLEC access lines as of 10/97. NYT access lines as of 12/31/96.						

CLEC MARKET SHARE			
Residential	0.3%	0.1%	0.3%
Business	5.9%	3.6%	5.5%
Total	2.5%	1.1%	2.1%
*Note - Results based upon information provided by 15 CLECs.			

CLEC LOCAL SWITCH LOCATIONS AND CAPACITY		
LOCATION	# SWITCHES	CAPACITY ACCESS LINES
Upstate	6	43,953
NY Metro	14	289,080
Total	20	333,033
*Note - Results based upon information provided by 9 facilities-based CLECs.		

COMPETITIVE CHECKLIST ITEMS PURCHASED FROM NYT														
CHECKLIST #	i	ii	iii	iv	v	vi	vii	viii	ix	x	xi	xii	xiii	xiv
# OF CLECS PURCHASING ITEM	7	2	2	4	4	1	9	7	6	4	7	4	4	8
*Note - Results based upon information provided by 15 CLECs.														

Description of Checklist Items

- i Interconnection
- ii Nondiscriminatory Access to Network Elements
- iii Nondiscriminatory Access to Poles, Ducts, Conduits, and Rights-of-Way
- iv Local Loop Transmission from the CO to the Customer's Premises, Unbundled from Switching or Other Services
- v Local Transport from the Trunk Side of a Wireline LEC Switch, Unbundled from Switching or Other Services
- vi Local Switching Unbundled from Transport, Local Loop Transmission or Other Services
- vii Nondiscriminatory Access to 1) 911 and E911 Services; 2) DA Services; 3) Operator Call Completion Services
- viii White Pages Directory Listings
- ix Nondiscriminatory Access to Telephone Numbers
- x Nondiscriminatory Access to Databases and Associated Signaling for Call Routing and Completion
- xi Interim Number Portability Through Remote Call Forwarding, DID Trunks, or other Comparable Arrangements
- xii Nondiscriminatory Access to Such Services or Information to Allow Local Dialing Parity
- xiii Reciprocal Compensation Arrangements
- xiv Telecommunications Services are Available for Resale

Status of Competition in New York

	<u>3/95</u>	<u>10/95</u>	<u>11/96</u>	<u>11/97</u>
<u>Collocation</u>				
Wire Centers	16	20	27	31 ¹
Nodes	36	49	123	174
<u>Channel Terminations</u>				
Sp. Acc. DS1	1,900	2,400	4,000	5,177
Sp. Acc. DS3	16	53	259	607
Sw. Acc. DS1	513	1,500	1,244	1,794
Sw. Acc. DS3	0	0	0	16
DS0	1,800	2,000	1,660	1,527
<u>Interconnection Data</u>				
MOUs ²	82.5M	120M	150M	734M
UNE Links ³	NA	3,300	13,400	19,908
Ported TNs ⁵	2,700	6,200	21,300	35,755
<u>NXX Codes</u> ⁶	28	76	149	374

¹ An additional 26 wire centers have collocation nodes under construction.

² MOUs are the total number of local minutes of use exchanged between Bell Atlantic's network and CLECs' networks in a month. These include both originating and terminating minutes.

³ UNE Links in previous reports were referred to as Switched Voice Grade Analog Loops (SVGALs) and are provided by Bell Atlantic to CLECs to furnish dial tone service to the competitors' customers.

⁵ Ported Telephone Numbers (TNs) are end user customer telephone numbers originally provided by Bell Atlantic that are now used by the end user customer with their local dial tone services provided by a CLEC.

⁶ NXX codes are assigned to CLECs. The 374 NXX codes translate into approximately 3.7 million telephone numbers that these carriers can use to provide service to their customers.

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of January, 1998, a copy of the foregoing
"Opposition of Bell Atlantic to Petition for Rulemaking" was served by first class U.S. mail,
postage prepaid, on the parties listed on the attached service list.

A handwritten signature in black ink, appearing to read "Jonathan R. Shipler", with a horizontal line drawn through the middle of the signature.

Jonathan R. Shipler

* BY HAND

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